

EXHIBIT L

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 ALPHA PHI ALPHA FRATERNITY
5 INC., A NONPROFIT ORGANIZATION ON
6 BEHALF OF MEMBERS RESIDING IN
7 GEORGIA; SIXTH DISTRICT OF THE
8 AFRICAN METHODIST
9 EPISCOPAL CHURCH, A GEORGIA
10 NONPROFIT ORGANIZATION; ERIC T.
11 WOODS; KATIE BAILEY GLENN;
12 PHIL BROWN; JANICE STEWART,
13 Plaintiffs,

14 vs. CIVIL ACTION NO. 1:21-CV-05337-SCJ
15 BRAD RAFFENSPERGER, IN HIS
16 OFFICIAL CAPACITY AS SECRETARY OF STATE
17 OF GEORGIA,

18 Defendant.

19 VIDEO TELECONFERENCE

20 DEPOSITION OF: JANICE STEWART
21 DATE: December 16, 2022
22 TIME: 12:58 P.M.

23 LOCATION: Thomas County Library
24 201 North Madison Street
25 Thomasville, GA

26 TAKEN BY: Counsel for the Defendant

27 REPORTED BY: LORI S. MORTGE,
28 Certified Court
29 Reporter, CCR

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1 your attorneys said to each other, I'm not asking
2 that. But did you review any documents specifically
3 to get ready to testify today?

4 A. Looked at a map.

5 Q. A redistricting map?

6 A. I'm not sure. Did you not hear me?

7 Q. Oh, I did hear you, yes, ma'am. Yes, I
8 did. I'm going to turn on my screen sharing here.
9 Do you see on this screen, this page, that says
10 Georgia House District 2022?

11 A. Yes.

12 Q. Is that the map that you looked at?

13 A. No.

14 Q. Okay. Can you tell me anything about
15 the map you looked at?

16 A. Not really, no.

17 Q. Do you have any sort of a file or notes
18 with you today to help you testify?

19 A. No.

20 Q. Have you kept any sort of a file of your
21 own on this case that you refer to from time to
22 time?

23 A. No.

24 Q. Tell me your current address.

25 A. [REDACTED] Thomasville, Georgia,

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1 [REDACTED]
2 Q. How long have you lived at that address
3 in Thomasville? Either number of years or since
4 such and such a year.

5 A. More than 15 years at that address.

6 Q. So you lived at that address on December
7 30 of 2021?

8 A. Yes.

9 Q. And you lived at that address on March
10 30, 2022?

11 A. Yes.

12 Q. Have you also lived in Thomas County for
13 15 years, or did you live in Thomas County for
14 longer than the 15 years?

15 A. I have lived in Thomas County for longer
16 than 15 years.

17 Q. And how long is that?

18 A. Over 30 years.

19 Q. Do you have any other properties in
20 Thomas County that you own?

21 A. Yes, a vacant lot.

22 Q. I'm going to show you now a document
23 that I'd like the Reporter to mark as Stewart 2.
24 This is a two-page document entitled: Declaration
25 of Janice Stewart. And I'll just scroll down to the

Page 23

1 A. They wanted to move the job to another
2 state.

3 Q. Where were you physically located when
4 you were working for Core & Main?

5 A. Thomasville, Georgia.

6 Q. Where were they moving to?

7 A. St. Louis. St. Louis is now the home
8 office.

9 Q. How many hours a week do you work?

10 A. I really don't know. I am salary and
11 it's 40-plus.

12 Q. Ms. Stewart, are you registered to vote
13 in Georgia?

14 A. Yes, I am.

15 Q. Do you know where you are registered to
16 vote?

17 A. Could you please clarify that?

18 Q. What county did you register to vote in?

19 A. Thomas County.

20 Q. Do you recall when you registered to
21 vote?

22 A. No, I do not.

23 Q. More than ten years ago?

24 A. Yes.

25 Q. More than 20 years ago?

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1 Q. Tell me, if you know, the number and/or
2 if you know the physical location.

3 A. Physical location is Covenant Church on
4 Highway 19.

5 Q. Do you happen to know the precinct
6 number?

7 A. No, I do not.

8 Q. I take it you've never voted in any
9 other state?

10 A. No, I have not.

11 Q. Ms. Stewart, do you consider yourself to
12 be a member of the Democratic party?

13 A. Yes, I do.

14 Q. And since when have you been a member of
15 the Democratic party?

16 A. As long as I have been voting.

17 Q. Have you ever held a leadership position
18 in the Democratic party?

19 A. No, I have not.

20 Q. Have you ever served on any committee in
21 the Democratic party?

22 A. No, I have not.

23 Q. Have you ever participated in any
24 activities of the Democratic party?

25 A. No, I have not.